

REMARKS

Claims 1-20 are pending.

Specification

The disclosure is objected to because of informalities. Specifically, the office action stated that 420 should be changed to 430 on page 13 line 26. The specification has been amended to address this objection. Further, the office action stated that “horizontal” should be changed to “vertical” on page 20 line 26. It is respectfully submitted that the specification should not be amended in this manner, therefore, this objection is traversed.

102(b) Rejections

Claims 1-17 and 19-20

Claims 1-17 and 19-20 are rejected under 35 U.S.C. § 102(b) as being anticipated by Itoh (US Patent No. 5,818,964). The Applicants have reviewed the cited references and respectfully submit that the present invention as recited in Claims 1-17 and 19-20 is not anticipated by Itoh.

With regard to independent Claims 1 and 8, Applicants respectfully disagree with the statement in the instant Office Action to the effect that Itoh teaches “generating a filter identifier based on one of an edge parameter ... and an activity metric...”, as recited in Claims 1 and 8.

Applicants understand Itoh to teach classifying windows of an image as homogenous, heterogeneous, or impulse noise by computing binary indexes of the pixels in the windows, and selecting filters based upon this classification. For example, at 4:31-32, Itoh teaches classifying a region (or window) as homogenous if an analysis of the pixels of that window results in all binary indexes of “0.” At 4:38-41, Itoh teaches selecting a strong smoothing filter for a homogenous region. Further, at 4:33-36, Itoh

teaches classifying a region as heterogeneous if an analysis of the pixels of that window results in binary indexes of “0” and “1.” At 4:46-49, Itoh teaches selecting a relatively weak smoothing filter for a heterogeneous region. Therefore, Itoh does not teach “generating a filter identifier based on one of an edge parameter ... and an activity metric...”, as recited in Claims 1 and 8.

Therefore, Applicants respectfully submit that Itoh does not teach nor render obvious Claims 1 and 8. Claims 2-7 are dependent on Claim 1 and Claims 9-14 depend on Claim 8. Further, Claims 2-7 and 9-14 recite additional limitations. Therefore, Applicants respectfully submit that the basis for rejecting Claims 1-14 under 35 U.S.C. § 102(b) is traversed.

Claim 15 recites “generating a measure of an edge parameter based on a second window of pixels with reference to the input pixel.” As already discussed, Itoh does not disclose or suggest “generating a measure of an edge parameter based on a second window of pixels with reference to the input pixel” as recited in Claim 15. Therefore, Applicants respectfully submit that Itoh does not teach or render obvious Claim 15. Claims 16, 17, and 19- 20 depend on Claim 15 and recite additional limitations. Therefore, Applicants respectfully submit that the basis for rejecting Claims 15-17 and 19-20 under 35 U.S.C. § 102(b) is traversed.

103(a) Rejections

Claim 18

Claim 18 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Itoh in view of Kim (US Patent No. 6,078,686). The Applicants have reviewed the cited references and respectfully submit that the present invention as recited in Claim 18 is not anticipated nor rendered obvious by Itoh and Kim, alone or in combination.

Applicants respectfully submit that Kim does not overcome the shortcomings of Itoh. Therefore, Applicants respectfully submit that Itoh and Kim, alone or in combination, do not show nor suggest the present invention as recited in independent Claim 15, and that this claim is considered patentable over Itoh and Kim (alone or in combination). Because Claim 18 depends on Claim 15 and contains additional limitations that are patentably distinguishable over Itoh and Kim (alone or in combination), this claim is also considered patentable over Itoh and Kim (alone or in combination). Therefore, Applicants respectfully submit that the basis for rejecting Claim 18 under 35 U.S.C. § 103(a) is traversed.

Conclusions

In light of the above remarks, Applicants respectfully request reconsideration of the rejected claims.

Based on the arguments presented above, Applicants respectfully assert that Claims 1-20 overcome the rejections of record and, therefore, Applicants respectfully solicit allowance of these claims.


Applicants have reviewed the references that the Office Action cited but did not rely upon and respectfully submit that these references neither teach nor suggest the claimed invention.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

WAGNER, MURABITO & HAO LLP

Date: 5/1/04



John P. Wagner
Reg. No. 35,398

Two North Market Street
Third Floor
San Jose, California 95113
(408) 938-9060